

OUR FILE NO.: 090.155440

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

- against -

10CV6005 (RWS)

NOTICE OF MOTION  
IN LIMINE

THE CITY OF NEW YORK, DEPUTY CHIEF  
MICHAEL MARINO, Tax Id. 873220, Individually and in  
his Official Capacity, ASSISTANT CHIEF PATROL  
BOROUGH BROOKLYN NORTH GERALD NELSON,  
Tax Id. 912370, Individually and in his Official Capacity,  
DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id.  
895117, Individually and in his Official Capacity,  
CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840,  
Individually and in his Official Capacity, LIEUTENANT  
JOSEPH GOFF, Tax Id. 894025, Individually and in his  
Official Capacity, STG. FREDERICK SAWYER, Shield  
No. 2576, Individually and in his Official Capacity,  
SERGEANT KURT DUNCAN, Shield No. 2483,  
Individually and in his Official Capacity, LIEUTENANT  
CHRISTOPHER BROSCART, Tax Id. 915354,  
Individually and in his Official Capacity, LIEUTENANT  
TIMOTHY CAUGHEY, Tax Id. 885374, Individually and  
in his Official Capacity, SERGEANT SHANTEL JAMES,  
Shield No. 3004, and P.O.'s "JOHN DOE" #1-50,  
Individually and in their Official Capacity (the name John  
Doe being fictitious, as the true names are presently  
unknown) (collectively referred to as "NYPD defendants"),  
JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK  
ISAKOV, Individually and in his Official Capacity, DR.  
LILIAN ALDANA-BERNIER, Individually and in her  
Official Capacity and JAMAICA HOSPITAL MEDICAL  
CENTER EMPLOYEE'S "JOHN DOE" # 1-50,  
Individually and in their Official Capacity (the name John  
Doe being fictitious, as the true names are presently  
unknown),

Defendants.

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**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law, defendant

DR. LILIAN ALDANA-BERNIER, by her attorneys, CALLAN, KOSTER, BRADY & NAGLER, LLP, will move this Court before the Hon. Robert W. Sweet, at 500 Pearl Street, New York, New York on October 9, 2015, at 12:00 pm, or as soon thereafter as counsel can be heard, for an Order to preclude Dr. Roy Lubit from testifying that plaintiff suffers from Post-Traumatic Stress Disorder (PTSD), and for such other and further relief as may be just and proper.

**WHEREFORE**, it is respectfully requested that the instant Motion be granted in its entirety.

Dated: New York, New York  
September 21, 2015

/s/ Matthew J. Koster  
Matthew J. Koster

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